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20 UNITED STATES DISTRICT COURT

21 NORTHERN DISTRICT OF CALIFORNIA, SAN JOSE DIVISION

22 CHASOM BROWN, MARIA NGUYEN,
23 and WILLIAM BYATT, individually and on
24 behalf of all similarly situated,

25 Plaintiffs,

26 v.

27 GOOGLE LLC and ALPHABET INC.,

28 Defendants.

Case No. 5:20-cv-03664-LHK

**STIPULATION OF VOLUNTARY
DISMISSAL OF DEFENDANT
ALPHABET, INC. WITHOUT
PREJUDICE; {PROPOSED} ORDER**

Judge: Honorable Lucy H. Koh

This stipulation is entered into between Plaintiffs and Alphabet Inc. (“Alphabet”), collectively referred to as the “Parties.”

WHEREAS, Plaintiffs filed their Class Action Complaint on June 2, 2020, against Google LLC (“Google”) and Alphabet, alleging violations of federal and state privacy laws;

WHEREAS, Alphabet represents that it is a holding company only and does not provide to putative class members any of the Google products or services identified in the Complaint; and

WHEREAS, Plaintiffs and Alphabet have entered into a separate agreement to toll the running of any statute of limitations, laches, and/or any statute of repose.

NOW THEREFORE, pursuant to Federal Rule of Civil Procedure 41(a)(2), Plaintiffs hereby dismiss all claims, *without* prejudice, against defendant Alphabet. Pursuant to agreement, the parties agree to bear their own fees and costs.

DATED: August 19, 2020

BOIES SCHILLER FLEXNER LLP

By /s/ Mark C. Mao
Mark C. Mao
Counsel on behalf of Plaintiffs

DATED: August 19, 2020

QUINN EMANUEL URQUHART &
SULLIVAN, LLP

By /s/ Andrew H. Schapiro
Andrew H. Schapiro
Counsel on behalf of Alphabet

CIVIL LOCAL RULE 5-1(i)(3)

Pursuant to Civil Local Rule 5-1(i)(3), the filer, Marc C. Mao, attests that concurrence in the filing of this document has been obtained from each of the signatories hereto.

By /s/ Mark C. Mao
Mark C. Mao
Counsel on behalf of Plaintiffs

1 **[PROPOSED] ORDER**

2 Pursuant to stipulation, and for good cause shown, the Court hereby **ORDERS**:

- 3 1. All claims in *Brown, et. al v. Google LLP*, No. 5:20-cv-03664-LHK (N.D. Cal.)
4 against named defendant Alphabet Inc. are hereby dismissed without prejudice.
- 5 2. Plaintiffs and defendant Alphabet Inc. shall each bear their own fees and costs related
6 hereto.

7 **IT IS SO ORDERED.**

8 DATED: August 24, 2020

Lucy H. Koh

9 Hon. Lucy H. Koh
10 United States District Judge

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